

**UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

IN RE:

Lashawanda Bland

Debtor,

Case No. 20-00850

Chapter 13

Judge Donald R. Cassling

Counsel for CFAI Special Assets LLC, has filed a motion to extend time to file a proof of claim for an additional 45 days.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to enter this order. You must:

File with the court a written response or an answer at least two (2) business days prior to the presentment date as indicated below. If you mail your response to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

Should an Objection be timely filed, the court will hold a hearing on the request to extend the time to file a proof of claim. If a timely objection is not filed the court may grant this motion without a hearing.

This hearing will take place on April 2, 2020 at 9:30 a.m. before the Honorable Donald R. Cassling at the United States Bankruptcy Court, 219 South Dearborn, Courtroom 619, Chicago, Illinois 60604.

Certificate of Service

I, Catherine Scanlan, state that on the 23rd day of March 2020, I served a copy of the Motion to Allow a Late Claim, Proposed Order, and Proof of Service of same upon:

David M Siegel
David M. Siegel & Associates
790 Chaddick Drive
Wheeling, IL 60090

Tom Vaughn
55 E. Monroe Street
Suite 3850
Chicago, IL 60603

Office of the U.S. Trustee, Region 11
219 S. Dearborn St.
Room 873
Chicago, IL 60604

by placing same in a well-sealed envelope, by first class mail, with the proper prepaid postage thereon and depositing same in a United States Mail receptacle in the City of Rochester, State of Michigan to Debtors and the City of Rochester, and via CM-ECF electronic filing to Debtors' Attorney, and the Trustee.

/S/Catherine Scanlan

Catherine Scanlan

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MOTION TO EXTEND TIME TO FILE CLAIM

CFAI Special Assets LLC (“Movant”) moves this Court for an Order to Allow a Late Claim with respect to the Real Property Located at 1055 N Lorel Ave, Chicago, IL 60651:

Debtor filed this Chapter 13 Bankruptcy case on January 11, 2020

1. The Proof of Claim bar deadline expires on March 23, 2020.
2. Movant’s secured claim on real property arises from a defunct corporate business debt, but the Debtor is claiming that their personal Chapter 13 bankruptcy stays the creditor.
3. Creditor disagrees with this proposition that the stay applies, but in order to preserve the Movant’s opportunity to participate in the plan if the creditor’s arguments fail then the creditor seeks an additional 45 days to file an prepare a proof of claim.
4. The allowance of Creditor’s claim does not prejudice the rights of any other creditor.

WHEREFORE, Movant requests that this Honorable Court approve the Motion to Extend time to File a Claim for additional 45 days from the date of entry of this order with respect to the real property located at 1055 N Lorel Ave, Chicago, IL 60651 and allow its secured claim to stand as filed, and for such other relief that court deems necessary and just.

Dated: March 23, 2020

/s/ Marc G. Wagman
Potestivo & Associates, P.C.
Marc G. Wagman

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